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8 **UNITED STATES DISTRICT COURT**
9 **WESTERN DISTRICT OF WASHINGTON**
10 **TACOMA DIVISION**

11 WILL CO. LTD. a limited liability company
12 organized under the laws of Japan,

13 Plaintiff,

14 vs.

15 DOES 1-20, d/b/a AVGLE.COM,

16 Defendants.

Case No.: 3:20-cv-05666-RSL

**DECLARATION OF JASON TUCKER
IN SUPPORT OF PLAINTIFF'S *EX*
PARTE MOTION FOR EARLY
DISCOVERY**

NOTE ON MOTION CALENDAR:
July 17, 2020

17
18 I, Jason Tucker, under penalty of perjury, declare and state as follows:

19 1. I am a United States Citizen, over the age of 18 years old, make this declaration
20 based upon personal knowledge and, if called to testify could and would testify competently to
21 the facts set forth herein.

22 2. I am President of Battleship Stance Inc., a leading intellectual property
23 management and anti-piracy enforcement company. Our clients include award winning adult
24 entertainment studios.
25
26

DECLARATION OF JASON TUCKER ISO
PLAINTIFF'S *EX PARTE* MOTION FOR EARLY
DISCOVERY
[3:20-cv-05666-RSL]

FREEMAN LAW FIRM, INC.
1107 ½ Tacoma Avenue South
Tacoma, WA 98042
(253) 383-4500 - (253) 383-4501 (fax)

1 3. I have been in the business of legal adult entertainment production (both on and
2 off the Internet), marketing, and management at an executive level for over fifteen (15) years,
3 serving for over six (6) years as President of a company that owns and licenses one of the
4 world's largest libraries of erotic images.

5 4. I have served as a consultant to Fortune 100 companies including Microsoft
6 Corporation for the rollout of several versions of Windows Media and in the development and
7 roll out of their Digital Rights Management technology and Akamai Technologies among others.

8 5. As an experienced executive within the adult entertainment industry, I have been
9 featured and quoted in publications including Newsweek, BusinessWeek, USA Today, Wired,
10 and the Washington Post and frequently am requested to speak on panels and at seminars at
11 industry events on various industry related topics and trends.
12

13 6. I have been involved in more than fifty (50) federal lawsuits brought against a
14 range of defendants for copyright infringement and have previously served as an expert witness
15 in similar proceedings.
16

17 7. Will Co. Ltd. retained Battleship Stance, Inc. to investigate copyright and
18 trademark violations and assist in certain litigation to enforce its intellectual property rights,
19 including violations on Avgle.com.
20

21 8. I have inspected, investigated, and researched the domain and web site
22 Avgle.com.

23 9. The domain Avgle.com is currently registered with Tucows Domains, Inc.,
24 located in Canada.

25 10. Currently, all registrant, administrative contact, and technical contact information
26 is redacted from public view.

DECLARATION OF JASON TUCKER ISO
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1 11. From my investigations, using a Internet history search tool, I was able to
2 determine that as recently as 2018, Avgle.com was registered through GoDaddy.com, LLC and
3 used a company names Domains By Proxy as a privacy service.

4 12. Avgle.com's domain name server is Cloudflare, Inc. located in California.
5 A domain name server connects a typed in domain name with the actual IP
6 address/location of a web site.

7
8 13. I was involved in investigations resulting in the application for a DMCA
9 subpoena on CloudFlare issued by a United States District Court regarding infringements on
10 Avgle.com. The issued and served subpoena revealed a payment to Cloudflare via PayPal for
11 services rendered to Avgle.com. These PayPal payments on behalf of Avgle.com were
12 associated with "Kam Keung Fung" and the email address support@avgle.com,
13 adavgle@gmail.com, and avgoraku@gmail.com.

14
15 14. Avgle.com is hosted on ipvolume.com located in Seychelles.

16 15. Avgle.com utilizes Content Delivery Network (CDN) services from
17 Cloudflare, Inc., located in California.

18 16. Content Delivery Networks are used to ensure more efficient and fast
19 delivery to local viewers when the main server is far away.

20 17. Multi Media, LLC dba Chaturbate, located in Lake Forrest, California, advertises
21 directly on Avgle.com.

22 18. Mile High Glass Pipes, located in Denver, Colorado, advertises directly on
23 Avgle.com.

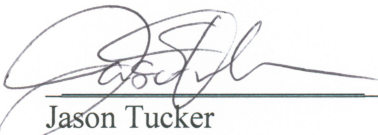
24 19. Advertising broker Tiger Media, Inc. brokers United States ads on Avgle.com
25 through its U.S servers. The Tiger Media, Inc. domains Juicyads.me are hosted at and serve ads
26

1 through Mojohost in Michigan, Jads.co through Mojohost in Michigan, and Juicyads.com
2 through Stackpath, LLC in Texas.

3 20. There is a hard-link, puss148.com, serving various ads to Avgle.com. This
4 link, while serving various ads, is not a known ad network nor associated with a known
5 ad network. By all appearances, Puss148.com is akin to Avgle.com and operated by the
6 same people. Puss148.com utilizes Enom, Inc. as it's registrar.
7

8
9 I declare under the penalty of perjury under the laws of the United States of America that
10 the foregoing is true and correct.
11

12 Execute on the 17^h day of July, 2020 at Scottsdale, Arizona.
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16 Jason Tucker
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